

SC NAACP v. Alexander,
D.S.C. Case No. 3:21-cv-03302-MGL-TJH-RMG

EXHIBIT 2

To: House Redistricting[Redistricting@schouse.gov]
Cc: Leah Aden[laden@naacpldf.org]; Stuart Naifeh[snaifeh@naacpldf.org]; Raymond Audain[raudain@naacpldf.org]; John Cusick[jcusick@naacpldf.org]; Steven Lance[slance@naacpldf.org]; Evans Moore[emoore@naacpldf.org]; Tonya Farrow Chestnut[tchestnut@naacpldf.org]; Somil Trivedi[strivedi@aclu.org]; Patricia Yan[pyan@aclu.org]; Samantha Osaki[sosaki@aclu.org]; Brenda Murphy[brendacmurph@gmail.com]; Frank Knaack[fknaack@aclusc.org]; Allen Chaney[achaney@aclusc.org]; Jay Lucas@schouse.gov [JayLucas@schouse.gov]; TommyPope@schouse.gov [TommyPope@schouse.gov]; GarySimrill@schouse.gov [GarySimrill@schouse.gov]; ToddRutherford@schouse.gov [ToddRutherford@schouse.gov]; ChrisMurphy@schouse.gov [ChrisMurphy@schouse.gov]; pathenegan@schouse.gov [pathenegan@schouse.gov]; ivorythigpen@schouse.gov [ivorythigpen@schouse.gov]
From: Leah Aden[laden@naacpldf.org]
Sent: Fri 10/8/2021 3:03:01 PM Eastern Standard Time
Subject: Proposed Congressional and House Map Submissions
Attachment: Letter to H Redistricting Ad Hoc Comm - Submitting Congressional and House Maps (10-8-21).pdf
Attachment: Appendices 1-3 - Previous Correspondence and Proposed Maps.pdf

Dear Chair Jordan and Committee Members:

The NAACP Legal Defense and Educational Fund, Inc., American Civil Liberties Union, South Carolina State Conference of the NAACP—which has 77 branches and over 13,000 members throughout South Carolina—and ACLU of South Carolina write to submit Congressional and state House of Representatives redistricting plans that are illustrative of ways this Committee may comply with its affirmative constitutional and statutory obligations and other guiding redistricting principles. Equally important, we also write to reiterate our grave concerns that this body is ill-prepared to ensure a transparent process for considering maps that meaningfully reflect public input during all stages of the redistricting cycle.

As we conveyed in our letters of August 9, 2021, August 30, 2021, and September 27, 2021, this Committee must, at minimum, meet its baseline affirmative obligations to comply with the U.S. Constitution and Section 2 of the Voting Rights Act (“VRA”) when developing redistricting plans. In satisfying these obligations, as explained in the attached letter of transmittal, officials must ensure that all South Carolinians have equal access to representation, and, that the voting strength of South Carolina’s racial minority voters is not illegally diluted or otherwise illegally minimized. To these ends, our proposed maps address the Fourteenth Amendment’s equal-population mandate, consider Section 2 compliance, and are informed by South Carolina’s voting patterns, history, and other relevant data and information. Our goal in developing these maps is to ensure that all voters have access to representation and Black voting power is not diluted in the process.

Attached to this email please find a letter of transmittal describing our proposed maps and these constitutional and statutory obligations and other guiding redistricting principles. In addition, we enclose the following for the Committee’s consideration:

- as Appendix 1, correspondence during the present redistricting cycle between signatories and this body;
- as Appendix 2, two proposed congressional maps and associated statistical reports; and
- as Appendix 3, a proposed House of Representatives map and an associated statistical report for your consideration

We will upload the requested block equivalency files for these maps to the Committee’s online portal. (We intend to provide shapefiles for our proposed maps as well; however, the Legislature’s email system does not appear to accept these files as attachments. We are contacting admin@statehouse.gov to inquire how best to provide these files to the Committee.)

Please feel free to contact Leah Aden, Deputy Director of Litigation at the Legal Defense Fund, at laden@naacpldf.org, and Somil Trivedi, Senior Staff Attorney at the ACLU, at stivedi@aclu.org, with any questions or to discuss these issues in more detail. We look forward to hearing from you soon and working together for the people of South Carolina.

Sincerely,

Leah Aden
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